

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

WARREN RICHARDS, on behalf of himself
and others similarly situated,

Plaintiff,

v.

GOOSE CREEK CANDLES LLC,

Defendant.

CASE NO. 1:25-CV-1188-JRS-MJD

JOINT MOTION TO AMEND CASE MANAGEMENT PLAN

Plaintiff, Warren Richards, on behalf of himself and others similarly situated, and Defendant, Goose Greek Candles LLC, jointly move the Court to extend the remaining deadlines set forth in the Case Management Plan entered on September, 2025 (DN 21), by 60 days.

The parties have been working diligently and cooperatively to move the case along, engaging in extensive (and continuing) discovery and are actively engaged in settlement discussions, including potentially scheduling a second mediation. The current deadlines will necessitate that the parties incur certain costs and expenses (such as expert witnesses and class certification briefing) in the very near future while they are attempting to see if this case can settle. Thus, the parties jointly request a 60-day extension to the current deadlines to allow them to save the cost and expense of litigation that will be unnecessary if a settlement is reached.

This motion is made in good faith and not for purposes of delay. No party will be prejudiced by the relief sought. Indeed, judicial and litigant resources will be conserved by enabling the parties to focus on trying to reach a settlement. Trial in this matter is set to begin on July 12, 2027, which will not be impacted by the requested extension.

For these reasons, the parties ask that the Court grant this motion.

Respectfully submitted,

/s/ Alisa Micu

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/s/ Anthony I. Paronich (with permission)

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on January 29, 2026, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following counsel of record:

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/s/ Alisa Micu

Counsel for Goose Creek Candles LLC